

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

LEONARD MAZZOLA, <i>Plaintiff,</i> vs. ANTHONY TOGLIATTI, et al. <i>Defendants.</i>	Case No. 1:19-cv-02519 Judge James S. Gwin Magistrate Judge David A. Ruiz
REPORT OF THE PARTIES' PLANNING MEETING UNDER FED. R. CIV. P. 26(F) AND L.R. 16.3(B)(3)	

1. Under Fed. R. Civ. P. 26(f) and L.P. 16.3(b)(3), a meeting was held on February 10, 2020 and was attended by Ashlie Case Sletvold for Plaintiff and Maia E. Jerin and Steven D. Strang for Defendants.
2. The parties will exchange initial disclosures by **February 20, 2020**.
3. The parties recommend the standard track.
4. The parties do not view this case as suitable for ADR.
5. The parties do not consent to the magistrate judge's jurisdiction.
6. Recommended discovery plan:
 - a. The parties will conduct discovery on the claims and defenses in the pleadings.
 - b. The parties have agreed to follow the default standard for discovery of ESI (Appendix K).
 - c. Proposed case schedule:
 - i. Fact-discovery cut-off date: **May 21, 2020**
 - ii. Plaintiff's expert report(s): **June 3, 2020**
 - iii. Defendants' expert report(s): **July 31, 2020**
 - iv. Expert depositions: **August 31, 2020**
7. Recommended dispositive motion date: **September 14, 2020**
8. Recommended cut-off for amending pleadings and/or adding parties: **March 20, 2020**.
9. Recommended date for status hearing: **May 7, 2020**.

10. No other matters for the attention of the Court at this time.

Dated: February 12, 2020

Respectfully submitted,

/s/Ashlie Case Sletvold

Ashlie Case Sletvold (0079477)
Subodh Chandra (0069233)
Brian Bardwell (0098423)
THE CHANDRA LAW FIRM LLC
The Chandra Law Building
1265 W. 6th St., Ste. 400
Cleveland, OH 44113
216.578.1700 Phone
216.578.1800 Fax
Ashlie.Sletvold@ChandraLaw.com
Subodh.Chandra@ChandraLaw.com
Brian.Bardwell@ChandraLaw.com

Attorneys for Plaintiff

/s/Steven D. Strang [per consent]

Monica A. Sansalone (0065143)
Steven D. Strang (0085444)
Maia E. Jerin (0092403)
Gallagher Sharp LLP
Sixth Floor Bulkley Building
1501 Euclid Avenue
Cleveland, OH 44115
216.241.5310 Phone
216.241.1608 Fax
msansalone@gallaghersharp.com
sstrang@gallaghersharp.com
mjerin@gallaghersharp.com

Attorneys for Defendants